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UNITED STATES OF AMERICA

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

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WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,
Plaintiff,

vs.

RICHARD BROWN TAUMOEPEAU, (01)
a/k/a "Tiki," "Haumeti,"
SIONE TUIONUKU, (02)
a/k/a "Sione Uli,"
CHAD TSUNEYOSHI, (03)
SIAOSI KUPU, (04)
a/k/a "George Kupu,"
SIOKATAME HAFOKA, (05)
a/k/a "Joe Hafoka," "Big Joe,"
SIOSATEKI TONGA, (06)
a/k/a "Sateki Tonga," "Teki,"
SIONE FOUKIMOANA, (07)
a/k/a "Fo," "Laiseni,"
TUITA VAHAI, (08)
a/k/a "Tweety,"
SOSAIA LIUFAU, (09)
a/k/a "Big Saia,"
SIONE TAU, (10)
a/k/a "Sione Leka,"
EPALAHAME LIAVA'A, (11)
a/k/a "Moni,"
Defendants.

CR. NO.

97 01199 DAE

INDICTMENT

[Count 1: 21 USC § 846;
Counts 2-10:
21 USC § 841(a)(1)
and 18 USC § 2]

SEALED

INDICTMENT

COUNT 1

The Grand Jury charges that:

A. General Allegations

From a time unknown but by 1990, and continuing to at least on or about October 23, 1997, in the District of Hawaii and elsewhere,

RICHARD BROWN TAUMOEPEAU
a/k/a "Tiki" and "Haumeti,"

SIONE TUIONUKU
a/k/a "Sione Uli,"

CHAD TSUNEYOSHI,

SIAOSI KUPU
a/k/a "George Kupu,"

SIOKATAME HAFOKA
a/k/a "Joe Hafoka" and "Big Joe,"

SIOSATEKI TONGA
a/k/a "Sateki Tonga" and "Teki,"

SIONE FOUKIMOANA
a/k/a "Fo" and "Laiseni,"

TUITA VAHAI
a/k/a "Tweety,"

SOSAIA LIUFAU
a/k/a "Big Saia,"

SIONE TAU
a/k/a "Sione Leka," and

EPALAHAME LIAVA'A
a/k/a "Moni"

defendants herein, conspired together with each other, and at various times (in Hawaii and elsewhere) with Samipeni ("Sam") Tafokitau, David Kaho, Semisi Katoa, Wilfredo Espinoza, Carla Fernandez, Ilaisaane Tuipulotu, Filita Lavulo (a/k/a Freda Vete), Andrea Henderson, and Brandi SamFong, all co-conspirators but not defendants herein, and, with other persons both known and unknown to the Grand Jury, to knowingly and intentionally distribute and to possess with intent to distribute quantities of cocaine (a Schedule II controlled substance) totaling in excess of 5 kilograms, in violation of Title 21, United States Code, Section 841(a)(1).

B. Objectives of the Conspiracy

It was the objective of this conspiracy that quantities of cocaine would be obtained on the U.S. Mainland, and transported to the State of Hawaii and other locations in the Pacific Rim, including New Zealand, Australia, and Guam, on an ongoing basis, to be distributed both within Hawaii and other Pacific Rim locations. It was further an objective of this conspiracy that quantities of cocaine would also be transported from the Island of Oahu to the Islands of Hawaii ("the Big Island") and Kauai, for distribution in both the Kona and Hilo sides of the Big Island and on Kauai.

The conspirators intended that the cocaine would be transported from the mainland to Hawaii, and, from the Island of Oahu to the Big Island and Kauai, on an ongoing basis, by various drug couriers. Monetary proceeds from the distribution of this cocaine, would in turn be sent from Hawaii to the U.S. Mainland, and, from the Big Island and Kauai to the Island of Oahu, also to be usually transported by courier(s).

C. Manner and Means of the Conspiracy

At all times material to this Indictment, defendant RICHARD BROWN TAUMOEPEAU, a/k/a "Tiki" was the leader and organizer of a group of associated individuals, including the named defendants and their co-conspirators (both named and unnamed), who together conducted the activities of the conspiracy alleged herein.

At various times during the existence of this conspiracy RICHARD BROWN TAUMOEPEAU tasked/directed individual co-conspirators to courier/transport quantities of cocaine between geographic locations; to pickup, drop off, or otherwise facilitate the movements of drug couriers; to receive, deliver and/or transport cocaine, and break down kilogram quantities and other large quantities of cocaine to smaller distribution-size quantities; and, to receive, collect, deliver and transport cash

monies which were the proceeds of drug trafficking activity. Individual members of the conspiracy were also tasked/directed by RICHARD BROWN TAUMOEPEAU, from time to time, to supervise and organize the drug distribution activities of individual drug distributors within particularized geographic areas, such as the islands of Oahu, Kauai, the Kona and Hilo sides of the Big Island, as well as in Australia, New Zealand, and Guam.

In furtherance and during the existence of this conspiracy, the defendants named in this Indictment from time to time participated in one or more of the above-described activities, in Hawaii and elsewhere, as follows:

1. SIONE TUIONUKU, CHAD TSUNEYOSHI, SIOKATAME "JOE" HAFOKA, SIOSATEKI "SATEKI" TONGA," SIONE FOUKIMOANA, and SIONE TAU received and delivered cocaine and cash monies which were proceeds of drug trafficking activity.

2. SOSAIA LIUFAU and SIONE TAU participated in storing/maintaining and breaking down large quantities of cocaine into smaller quantities for distribution.

3. SIONE TUIONUKU, CHAD TSUNEYOSHI, SOSAIA LIUFAU, and SIONE TAU facilitated the movement of drug couriers.

4. SIOKATAME "JOE" HAFOKA, SIONE FOUKIMOANA, and TUITA VAHAI were couriers of cocaine.

5. SIONE TUIONUKU, CHAD TSUNEYOSHI, SIAOSI KUPU, SIOSATEKI ("SATEKI") TONGA, SIONE FOUKIMOANA, TUITA VAHAI, SIONE TAU, and EPALAHAME LIAVA'A couriered cash monies which were proceeds of drug trafficking activity.

6. SIAOSI KUPU at different times supervised drug distribution activities of drug distributors on the island of Kauai, and on the Kona side of the Big Island.

7. SIOSATEKI ("SATEKI") TONGA at different times supervised drug distribution activities of drug distributors on Oahu, and on the Hilo side of the Big Island.

8. EPALAHAME LIAVA'A received cocaine sent to, and intended for, distribution in New Zealand.

D. Effects of the Conspiracy in Hawaii

As a result of the operation of, and in furtherance of this conspiracy, more than 150 kilograms of cocaine were transported to (and distributed within) the State of Hawaii between 1990 and October 23, 1997.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

The Grand Jury further charges that:

On or about July 9, 1993,

RICHARD BROWN TAUMOEPEAU
a/k/a "Tiki" and "Haumeti"

defendant herein, did willfully and unlawfully aid and abet drug courier Ilaisaane Tuipulotu to knowingly and intentionally possess with intent to distribute in the District of Hawaii, in excess of 500 grams (to wit approximately 1 kilogram) of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 3

The Grand Jury further charges that:

On or about January 14, 1994,

RICHARD BROWN TAUMOEPEAU
a/k/a "Tiki" and "Haumeti"

defendant herein, did willfully and unlawfully aid and abet drug courier Filita Lavulo (aka Freda Vete) to knowingly and intentionally possess with intent to distribute in the District of Hawaii, in excess of 500 grams (to wit approximately 1 kilogram) of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 4

The Grand Jury further charges that:

On or about May 2, 1996, in the District of Hawaii,
defendants

RICHARD BROWN TAUMOEPEAU
a/k/a "Tiki" and "Haumeti," and

SIONE TUIONUKU
a/k/a "Sione Uli"

each aiding and abetting the other and aided and abetted by
Samipeni Tafokitau, knowingly and intentionally distributed
approximately 1 ounce of cocaine, a Schedule II controlled
substance.

All in violation of Title 21, United States Code,
Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 5

The Grand Jury further charges that:

On or about May 7, 1996, in the District of Hawaii,
defendants

RICHARD BROWN TAUMOEPEAU
a/k/a "Tiki" and "Haumeti,"

SIONE TUIONUKU
a/k/a "Sione Uli," and

CHAD TSUNEYOSHI

each aiding and abetting the other, knowingly and intentionally
distributed approximately 1 ounce of cocaine, a Schedule II
controlled substance.

All in violation of Title 21, United States Code,
Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 6

The Grand Jury further charges that:

On or about May 10, 1996, in the District of Hawaii,
defendants

RICHARD BROWN TAUMOEPEAU
a/k/a "Tiki" and "Haumeti," and

SIONE TUIONUKU
a/k/a "Sione Uli"

each aiding and abetting the other and aided and abetted by
Samipeni Tafokitau, knowingly and intentionally distributed
approximately 2 ounces of cocaine, a Schedule II controlled
substance.

All in violation of Title 21, United States Code,
Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 7

The Grand Jury further charges that:

On or about May 30, 1996, in the District of Hawaii,
defendants

RICHARD BROWN TAUMOEPEAU
a/k/a "Tiki" and "Haumeti," and

SIONE FOUKIMOANA
a/k/a "Fo"

each aiding and abetting the other, knowingly and intentionally
distributed approximately 2 ounces of cocaine, a Schedule II
controlled substance.

All in violation of Title 21, United States Code,
Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 8

The Grand Jury further charges that:

On or about June 26, 1996, in the District of Hawaii,
defendants

RICHARD BROWN TAUMOEPEAU
a/k/a "Tiki" and "Haumeti," and

CHAD TSUNEYOSHI

each aiding and abetting the other and aided and abetted by
Samipeni Tafokitau, knowingly and intentionally distributed
approximately 5 ounces of cocaine, a Schedule II controlled
substance.

All in violation of Title 21, United States Code,
Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 9

The Grand Jury further charges that:

On or about August 23, 1996,

RICHARD BROWN TAUMOEPEAU
a/k/a "Tiki" and "Haumeti"

defendant herein, did willfully and unlawfully aid and abet drug
courier Andrea Henderson and accomplice Wilfredo Espinoza, to
knowingly and intentionally possess with intent to distribute in
the District of Hawaii, in excess of 500 grams (to wit
approximately 4 kilograms) of cocaine, a Schedule II controlled
substance.

All in violation of Title 21, United States Code,
Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 10

The Grand Jury further charges that:

On or about October 23, 1997,

RICHARD BROWN TAUMOEPEAU
a/k/a "Tiki" and "Haumeti"

defendant herein, did willfully and unlawfully aid and abet drug courier Brandi SamFong to knowingly and intentionally possess with intent to distribute in the District of Hawaii, in excess of 500 grams (to wit approximately 1 kilogram) of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.


DATED: 12-17-97, at Honolulu, Hawaii.

A TRUE BILL

15/

FOREPERSON, GRAND JURY


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UNITED STATES v. RICHARD BROWN TAUMOEPEAU;
Cr. No. _____; "INDICTMENT"